

# **EXHIBIT 2**

LAW OFFICES  
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May 15, 2019

**VIA EMAIL**

Christina L. Briesacher  
**KIRKLAND & ELLIS LLP**  
300 North LaSalle  
Chicago, IL 60654  
christina.briesacher@kirkland.com

Re: *In re Pork Antitrust Litig.*, 18-cv-01776 (D. Minn.) – Clemens Document  
Custodians

Dear Christina:

I write in response to your letter dated April 18, 2019, regarding the proposed document custodians for Defendants Clemens Food Group, LLC, and The Clemens Family Corporation (“Clemens”). Pursuant to § V(A)(2)(a) of the ESI Protocol Order (ECF No. 292), additional document custodians are proposed below on behalf of all Plaintiffs.

We look forward to discussing this with you. Please let me know some times in the next couple weeks when you are available to talk.

**Custodial Sources**

*Proposed by Clemens:*

<b>Name</b>	<b>Title</b>
Douglas Clemens	Clemens Food Group, LLC: Chairman (2015-2018); Vice Chairman (2007-2014); President (2007-2014)  The Clemens Family Corporation: Chairman (2015-2018); CEO (2014-2018)
Craig Edsill	Clemens Food Group, LLC: President (2014-2018); Executive Vice President (2007-2014)

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Eric Patton	Clemens Food Group, LLC: Senior Vice President (2016-2018); Vice President (2012-2016)
Joshua Rennells	Clemens Food Group, LLC: Treasurer (2017-2018); Senior Vice President (2015-2018); Vice President (2012-2014); Vice President, Supply Chain (2008-2009); General Manager (2009); Assistant Treasurer (2007-2008)  The Clemens Family Corporation: Treasurer (2017-2018)
Robert Ruth	Clemens Food Group, LLC: Senior Vice President (2010-2018); Senior Vice President, Sales & Marketing (2008-2010); Assistant Secretary (2007-2008)
Daniel Groff	Country View Family Farms, LLC: Director of Hog Procurement (2008-2018)

To the extent a designated custodian (whether proposed by Clemens or by Plaintiffs) inherited custodial files from his or her predecessor, we request that those files be included in the custodial productions.

*Additional Custodians Proposed by Plaintiffs:*<sup>1</sup>

<b>Name</b>	<b>Title</b>
David W. Budnick	Clemens Food Group, LLC: CFO (2007-2016); Treasurer (2007-2017)  The Clemens Family Corporation: CFO and Treasurer (2007-2016); Family Office VP (2016)
Christopher Carey	Clemens Food Group, LLC: Supply Chain VP (2016-2018)
Kenneth W. Clemens	The Clemens Family Corporation: Director Emeritus of the Owners Advisory Council (2011-2015); Member of Succession Planning Committee (2011-2014)

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<sup>1</sup> The organizational charts produced by Clemens are not always clear in what role these individuals worked for Clemens, for which entity, or when. We have attempted to provide as much relevant information as possible to facilitate this conversation, but note that it may be incomplete and Clemens is likely in possession of superior information.

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Michael Deskiewicz	Clemens Food Group, LLC: VP Operations (2012-2015)
Wilma Keller	The Clemens Family Corporation: Corporate Executive Assistant (2007-2009)
Diane Nice	The Clemens Family Corporation: Corporate Executive Assistant (2009-2011)
Randy Zorn	Clemens Food Group, LLC: VP Operations, Coldwater (at least 2018)
Philip A. Clemens	Clemens Food Group, LLC: Chairman (2007-2015); CEO (2007-2012)  The Clemens Family Corporation: Chairman (2007-2015); CEO (2007-2014)
Michael Bracella	Clemens Food Group, LLC: VP Facilities (2005-2015)
Jeffrey Wall	Clemens Food Group, LLC: VP Operations, Hatfield (at least 2018); Senior VP (date unknown)
John Garzel	Clemens Food Group, LLC: Supply Chain VP (2007-2008)
Martin Reeser	Clemens Food Group, LLC: VP (2012)
John Reininger	The Clemens Family Corporation: Chief Relationship Officer (2009-2014); Asst. Treasurer (2011-2014); Asst. Corporate Secretary (2015-2017)  Clemens Investments LLC: Executive VP (2015-2017)
Michael Riley	Clemens Food Group, LLC: VP Business Development (date unknown)
Sandra Sage	Clemens Food Group, LLC: VP Retail (2016-2018)
Craig Bach	Clemens Food Group, LLC: Account Manager (date unknown)
Alessandro Bassanini	Country View Family Farms: Corporate General Manager (at least 2008)
Jeffrey Feirick	The Clemens Family Corporation: Corporate Attorney (2005-2014); Chief Compliance Officer (2009-2014); Corporate Secretary (2012-2014)
Anthony Schiano	Clemens Food Group, LLC: Board Member (2008-2018)  The Clemens Family Corporation: Board Member (2008-2018)

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Charles Zimmerman	Clemens Food Group, LLC: Board Member (2007-2012)  The Clemens Family Corporation: Board Member and Lead Director (2007-2018)
Thomas Clemens	Clemens Food Group, LLC: Senior VP (2010-2015); Facility and Operations Senior VP (2008-2010)
Tara Bahn	Clemens Food Group, LLC: Corporate Secretary (2015-2017); Director of Shareholder Services (2018)  The Clemens Family Corporation: Corporate Secretary (2015-2017); Corporate Counsel (2014-2017); Corporate Secretary (2015-2017)
Bradford Clemens	Clemens Food Group, LLC: Senior VP (2018); Tech Services and Marketing Solutions Senior VP (2015-2017)

### Non-Custodial Sources

#### Proposed by Clemens:

In its initial disclosures dated March 8, 2019, Clemens disclosed the existence of the following non-custodial data sources.

#### Unstructured Data

- Certain Departmental Shared Network Drives
- Sharepoint

#### Structured Data

- SAP ERP: Sales and finance
- Protean: Sales
- BPC (Business Planning and Consolidation): Sales and finance
- IBM Sterling Integrator: EDI system (since May 2017)
- MAS 200: Country View Family Farms, LLC finance

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This list does not provide Plaintiffs with enough information to fully understand what types of data may be collected from these sources. Plaintiffs will need to understand which non-custodial sources contain data that is responsive to each request, any issues with the format of the data, and whether the data is appropriate for a keyword search or a “go get” search. In addition, we need to know whether there are any non-custodial sources of hard-copy documents that are likely to contain discoverable documents.

*Additional Document Sources Proposed by Plaintiffs:*

Plaintiffs propose that any collection efforts include any sources that contain the following:

- Any copies of any phone records for company main lines or combined company cellular telephone bills;
- Travel and expense records for Document Custodians;
- Locations where Credit Relations, Investor Relations, and Corporate Communications information are kept;
- Hard-copy and electronic calendars of Document Custodians;
- Hard-copy documents maintained by Departments or Divisions, but not a specific Document Custodian, relating to competitor communications or analysis of Pork Supply Factors.

Sincerely,

PEARSON, SIMON & WARSHAW, LLP

*/s/ Joseph C. Bourne*

JOSEPH C. BOURNE

cc: All Counsel for Clemens  
Co-Lead Counsel for all Plaintiffs